

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MARANDA LYNN ODONNELL, ET AL. §
Plaintiffs, §
§
v. §
§
HARRIS COUNTY, TEXAS, ET AL. § Case No. 16-cv-01414
Defendants. §
§
§
§
§

**THE ATTORNEY GENERAL OF TEXAS'S
MOTION TO VACATE CONSENT DECREE**

The Attorney General of Texas, Ken Paxton, hereby moves to terminate or dissolve the consent decree. *See* Dkt. No. 708 ("Consent Decree"). The Court should grant the motion because, as the Fifth Circuit held in *Daves v. Dallas County*, 64 F.4th 616, 631 (5th Cir. 2023) (*en banc*), the Court should not have exercised jurisdiction, and Senate Bill 6 ("S.B. 6") rendered plaintiffs' claims moot. Alternatively, dissolution is warranted under Federal Rule of Civil Procedure 60(b) given intervening changes in state law.

Respectfully submitted,

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/s/ Joe Nwaokoro
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COUNSEL FOR THE ATTORNEY GENERAL
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CERTIFICATE OF SERVICE

I certify that on this 26th day of August 2025, a true and correct copy of the foregoing document was filed and served via the Court's CM/ECF system to all counsel of record.

/s/ Joe Nwaokoro
Joe Nwaokoro
Assistant Attorney General

CERTIFICATE OF CONFERENCE

I hereby certify that on August 19, 2025, I conferred with counsel for Plaintiffs and Defendants via email regarding the substance of the foregoing motion. Plaintiffs stated that they are opposed to the extent it is based on the Fifth Circuit's decision in *Daves* but are unopposed for the limited purpose of filing a Rule 60(b) motion based on a change in state law. Defendant Harris County is opposed. Other defendants did not respond and are presumed to be opposed.

/s/ Joe Nwaokoro
Joe Nwaokoro
Assistant Attorney General